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July 10, 2020

Via ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 701
New York, NY 10007
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LimanNYSDCChambers@nysd.uscourts.gov

Re: Convergen Energy LLC et al. v. Brooks et al.

Dear Judge Liman:

Pursuant to the Court's direction, the parties have been engaging in lengthy and technically in-depth meet and confer sessions. At this point, the parties are cautiously optimistic that they can resolve most of the issues raised by Plaintiffs' preliminary injunction motion. The parties agree that they need additional time to continue to work through the issues involved. To facilitate those continued discussions, the parties respectfully request that all dates in the schedule set by the Court's May 22 Order be suspended by an additional three weeks, with a hearing scheduled on August 12 or later at the Court's convenience. The parties agree to update the Court as to their progress by Friday, July 31, 2020 at 5:00 p.m. Eastern Time. I am authorized to state that Attorneys Ryan Billings and Benjamin LaFrombois have reviewed and agree with this letter.

Respectfully,

/s/ Michael Stolper
Michael Stolper, Esq.

cc: Defense counsel via email and ECF